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UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA

CHANDRA K. WALLICK,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; HYUNDAI FINANCE; SANTANDER
CONSUMER USA,

Defendant.

Case No.: 2:19-cv-01788-JCM-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEFENDANT
HYUNDAI CAPITAL AMERICA'S
TIME TO RESPOND TO COMPLAINT**

(FIRST REQUEST)

This Stipulation to Extend Time to Respond to Complaint is made by and between Plaintiff Chandra K. Wallick (“Plaintiff”) and Defendant Hyundai Capital America (“Hyundai”), incorrectly named as Hyundai Finance, through their respective counsel, in light of the following facts:

RECITALS

A. Plaintiff filed the Complaint (“Complaint”) against Hyundai on or about October 15, 2019.

B. Hyundai was served with the Complaint on October 17, 2019.

C. Hyundai understands that a response was therefore due on November 7, 2019.

D. Hoping to resolve the matter outside of litigation, a representative from Hyundai contacted counsel for Plaintiff prior to the deadline to respond and requested a settlement demand. However, Hyundai did not receive a response and, in waiting, the deadline to respond passed.

1 E. Hyundai has now retained counsel, and undersigned counsel is contemporaneously
2 filing its appearance in this matter.

3 F. The parties agreed to extend Hyundai's time to respond to the Complaint through
4 December 10, 2019, in order to give Hyundai further time to investigate Plaintiff's claims and
5 prepare a proper response, and for the parties to discuss a potential resolution of this matter.

6 G. There is good cause to grant this stipulation because Hyundai is still in the process
7 of investigating the claims and Plaintiff's counsel has indicated he would be providing a settlement
8 demand for Hyundai's consideration.

9 H. Pursuant to Local Rule IA 6-1 and Local Rule 7-1, Plaintiff and Hyundai
10 respectfully request that the Court extend Hyundai's time to respond to Plaintiff's Complaint through
11 December 10, 2019.

STIPULATION

13 **NOW, THEREFORE**, Plaintiff and Hyundai hereby stipulate and agree that Hyundai has
14 up to and including December 10, 2019, to file a response to Plaintiff's Complaint.

15 || DATED: November 14, 2019

DATED: November 14, 2019

16 LEWIS ROCA ROTHGERBER
17 CHRISTIE LLP

HAINES & KRIEGER, LLC

18 By: /s/ J Christopher Jorgenson
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Attorney for Plaintiff

IT IS SO ORDERED

DATED: November 15, 2019

Brenda Weksler
BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2019, I electronically submitted the foregoing document with the Clerk of the Court for the U.S. District Court, District of Nevada, using the CM/ECF System of the Court and that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

- Electronic Service – By serving a copy thereof through the Court’s electronic service system; and/or
- U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage prepaid and addressed as listed below.

/s/ *Kenny Jackson*
An employee of
LEWIS ROCA ROTHGERBER CHRISTIE LLP